



## **A REPORT SUBMITTED TO THE ILLINOIS GENERAL ASSEMBLY**



## **PURSUANT TO SENATE RESOLUTION 528**

*January 2, 2018*

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*This report was a collaborative effort of the Office of Governor Bruce Rauner, the Illinois Deaf and Hard of Hearing Commission, the Illinois Department of Human Services, Division of Rehabilitative Services and Illinois Department of Financial and Professional Regulation, Division of Professional Regulation.*

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## *Introduction*

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The Illinois Deaf and Hard of Hearing Commission (IDHHC) has been the subject of recent news reports and concerns expressed by various individuals including those with hearing loss related to its programs and services.

Initially, SB 752 was introduced proposing changes to IDHHC's enacting statute. As various stakeholders were unable to reach an agreement on proposed changes to IDHHC enacting statutes, SB 752 was ultimately held in the House Human Services Committee. Thereafter, Senate Resolution 528 was passed urging the Governor's Office in collaboration with the Illinois Deaf and Hard of Hearing Commission to develop recommendations to ensure the Commission is better able to serve the deaf, hard of hearing, and DeafBlind community.

The Senate Resolution seeks recommendations on the following areas:

- (1) Hiring freezes placed on or at the Commission;
- (2) Any official orders that limit the functions of the Commission, including orders that have come from the Office of the Governor, the Governor's Office of Management and Budget, the Department of Central Management Services, or any other appropriate entities;
- (3) Whether the transfer of the administration of the Interpreter for the Deaf Licensure Act of 2007 to the Department of Financial and Professional Regulation will better benefit interpreters and the deaf, hard of hearing, and DeafBlind community, and any positive and negative effects the transfer would have, including, but not limited to, any change in related fee amounts;
- (4) Whether the Commission should be housed within the Department of Human Services, and the report shall include, at minimum, the following:
  - (a) If the move will provide the Commission with more resources and administrative help so that it can focus on providing specialized services for the deaf, hard of hearing, and DeafBlind community; and
  - (b) If the move can allow for the Commission to operate as an independent entity and not create conflicts of interest between the Department program staff who currently serve deaf, hard of hearing, and DeafBlind populations, the Commission, and the populations that the Commission serves; and
- (5) Identifying groups or populations with hearing loss that have been underserved or are not formally recognized.

Pursuant to SR 528, IDHHC solicited public comments. Comments could be submitted to IDHHC in writing via a dedicated email address or US Mail, anonymously through IDHHC's website, or in American Sign Language (ASL) through video attachment or video message to a dedicated video phone number. Additionally, some comments were sent directly to the Governor's Office. The comments are attached hereto in Appendix B. IDHHC has provided a written summary of the video comments received.

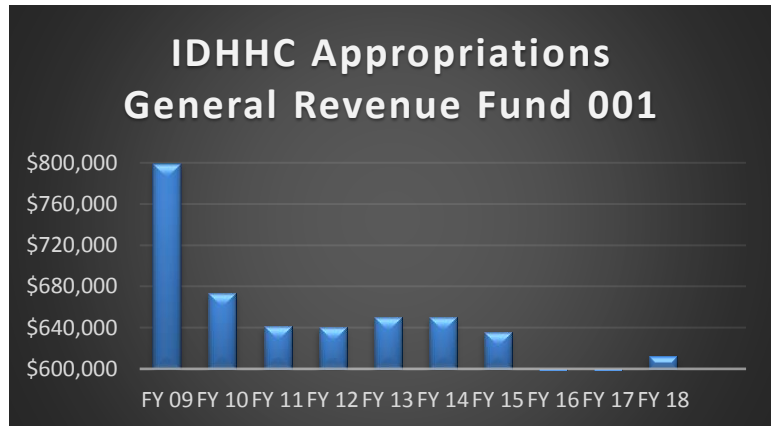
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## Commission Overview

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The Illinois Deaf and Hard of Hearing Commission is an executive State agency established in 1997. It is overseen by 11 Commissioners that are appointed by the Governor's Office. IDHHC holds quarterly meetings with the Commissioners which are open to the public. IDHHC's enacting statute is attached hereto in Appendix A.

IDHHC current Fiscal Year 2018 appropriation from the General Revenue Fund is \$611,900. This is a 23% decrease from ten years ago. Recognizing the unprecedented fiscal challenges, IDHHC initially could identify cost savings and efficiencies.



Unfortunately, the biggest impact is the headcount; which is crucial to providing services to this underserved population.

Since FY 2009, IDHHC has maintained a funded headcount of 7. In FY 2011, the decrease in appropriations forced IDHHC to prioritize filling positions. As a result, IDHHC absorbed the Interpreter Coordinator Position within its existing headcount. Currently, IDHHC staffing headcount is allocated to the following positions: Director, Assistant Director, Personnel Manager, Legal Counsel, Program Coordinator, Office Assistant and Interpreter Coordinator. The Interpreter Coordinator position is funded through the Interpreter for the Deaf Fund – 449. All remaining positions are funded through IDHHC appropriations from the General Revenue Fund – 001.

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## *Analysis & Recommendations*

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### **A. Hiring Freezes**

During the past three years, there have been four hiring freezes which have effected IDHHC.

- August 27, 2015 – September 16, 2015
- October 31, 2016 – November 21, 2016
- March 1, 2017 – March 24, 2017
- August 30, 2017 – September 20, 2017

When a vacancy occurred, IDHHC would review the functions of the position and determine if the needs of the agency would be better served through position reallocation or reclassification. Unfortunately, these decisions were often delayed due to staff being out on protected leave from the agency during the last two years.

Recommendations:

IDHHC will complete the interview and selection process for the Interpreter Coordinator and Program Coordinator vacancies. Job postings were completed November 21, 2017 – December 5, 2017. The community has been made aware of these postings through IDHHC's website and ListServ Announcement. IDHHC is bound by union contractual agreements, civil service rules, etc. in determining salary and compensation structure for its employees.

IDHHC will proceed with recruitments efforts to hire a new Director. This position became vacant on November 9, 2017. On December 28, 2017, a special meeting was held for Commissioners to review and determine hiring procedures.

### **B. Limitations**

All state agencies including IDHHC were instructed to implement various cost savings and efficiencies.

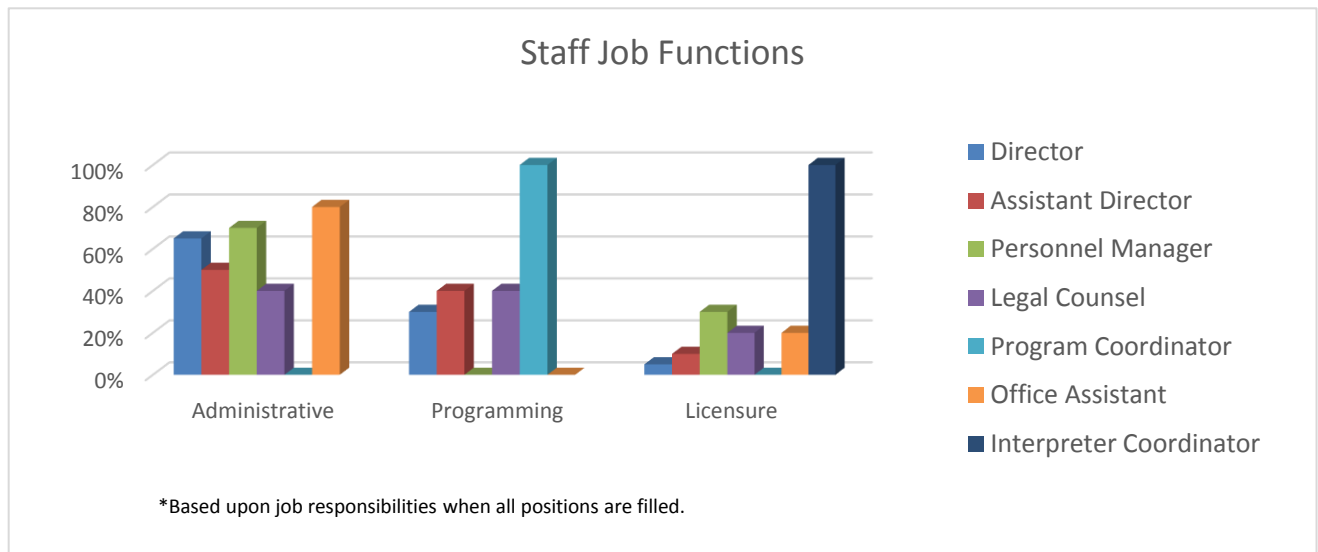
- Executive Order 10 (July 1, 2010) requiring Additional Spending Reductions;
- Administrative Order 4 (2010) authorizing the Director of GOMB to implement reductions in spending in Fiscal Year 2011;
- Executive Order 08 (January 12, 2015) to Address the State's Fiscal Crisis.

IDHHC implemented the following:

- Reduced lease cost;
- Eliminated agency vehicles;
- Reduced travel;
- Consolidated IT services with the Department of Central Management Services (CMS); and
- Reclassified staff positions.

Recommendations:

IDHHC has noticed an increased demand for individual advocacy. This is typically not service provided by IDHHC. However, where there is not a Deaf Services Coordinator (DSC) at the Center for Independent Living (CIL) in their area, IDHHC will provide this service. While each situation varies, the average staff time could range from 1 hour to 25 hours. Currently only 50% of the 22 CILs located throughout the State have a DSC employed. DSCs are essential for deaf and hard of hearing individuals to access the services provided by the CIL. DSCs are typically deaf individuals which can provide direct communication and understand unique needs of the community. Last year, CILs report serving 417 customers with hearing loss.



For IDHHC to better serve the needs of all segments of the Deaf and Hard of Hearing community, it must be able to devote more time to programs. The current staff spends a majority of its time handling the administrative responsibilities of maintaining the agency. The administrative duties include but are not limited to, personnel, budgeting, procurement, voucher processing, IT, agency audits by Office of the Auditor General, and various reporting requirements.

In coordination with the Governor's Office, IDHHC will seek to maximize its current headcount and find innovative ways to streamline or reduce administrative responsibilities to redirect staffing resources to focus on programing issues within the community.

Additionally, IDHHC in coordination with DHS, will develop a survey for the individual CILs to better understand their needs and potential limitations in serving the Deaf and Hard of Hearing community.

### ***C. Sign Language Interpreter for the Deaf Licensure***

With regards to the Illinois Department of Financial and Professional Regulation, the resolution inquires whether the transfer of the administration of the Interpreter for the Deaf Licensure Act of 2007 to the Department of Financial and Professional Regulation will better benefit interpreters and the Deaf, Hard of Hearing, and DeafBlind community identifying the positive and negative effects the transfer would have, including, but not limited to, any change in related fee amounts.

The Illinois Department of Financial and Professional Regulation (IDFPR) oversees the regulation and licensure of banks and financial institutions, real estate business and professionals, and various licensed professions, and enforces standards of professional practice.

IDFPR protects the public health, safety and welfare of Illinois citizens in their interactions with professionals the IDFPR licenses and regulates. Illinois currently licenses and regulates approximately 1.1 million professionals and firms in approximately 100 professions within Illinois, ranging from healthcare to real estate and other professionals. These professions include, but are not limited to, speech-language pathologists, audiologists, doctors, nurses, social workers, veterinarians, certified public accountants, barbers, engineers, and detectives. Additionally, IDFPR also is mandated with enacting the enforcement and disciplinary provisions of the Interpreter for the Deaf Licensure Act of 2007.

Given IDFPR's diversity of professionals it currently regulates through licensure and the Department's involvement in the disciplinary aspects of Illinois' sign language interpreters, IDFPR could assume the licensing responsibilities currently held by the Illinois Deaf and Hard of Hearing Commission with a properly planned transition. This responsibility would be administered by the Department's Division of Professional Regulation.

IDFPR advocacy in such a transition would be limited to policy, evaluation, certification, and licensure of sign language interpreters including any legislation impacting sign language interpreter licensure. Coordinating, administering and advocating for programs and services for persons in Illinois who are deaf or hard of hearing are beyond the mission statement of IDFPR and are better suited for the Deaf and Hard of Hearing Commission or another state entity.

A proper licensure/regulatory transition would encompass the following:

- implementing necessary statutory changes to both transfer and update administrative and funding authority over the licensing of sign language interpreters to IDFPR;
- transferring the Illinois Board of Interpreters for the Deaf and the Interpreter Coordinator to IDFPR to advise the Department on licensing and enforcement issues related to this profession;
- maintaining examination authority with IDFPR;

- authorizing the Department to have sole access to the Interpreters for the Deaf Fund for the administration and enforcement of the Interpreter for the Deaf Licensure Act of 2007;
- enabling the Department to implement an adequate fee structure to properly fund the licensure and regulation of this profession; and,
- delaying the effective date to enable the transition to be implemented smoothly.

Benefits realized by authorizing IDFPR to oversee licensure and discipline of sign language interpreters would include:

- Having an experienced regulator accustomed to licensing and regulating diverse professions, including those professions with small populations: IDFPR licenses and regulates numerous professions comparable to the population of the Illinois sign language interpreters.
- Increased support resources (i.e., call center, extensive website, IT services, legal services, fiscal services, legislative services) to effectively address licensure and disciplinary issues impacting the sign language interpreting profession and the Deaf community served by this profession.
- Improved staffing infrastructure.
- Agency commitment to make sign language interpreter licensure paperless (Read: bring on-line). Currently, this process remains paper oriented.
- Legislative division that could propose legislation to update outdated statute.
- Allows Deaf and Hard of Hearing Commission or other state entities to focus services aimed at assisting the deaf and hard of hearing community to improve their quality of life.
- Freeing up General Revenue Funds (GRF) for other purposes by implementing fee changes necessary to make the regulatory program self-sufficient.

Drawbacks realized by authorizing IDFPR to oversee licensure and discipline of sign language interpreters would include:

- Possibility of increasing licensure fees to make the program self-sufficient if the Department is required to take on current staff. Current fees are insufficient to support the program. The program is supported in part by GRF appropriated to IDHHC.
- Need for IDFPR to make expenditures to supplement existing services to service individuals who are deaf and hard of hearing.
- Division of services for the deaf and hard of hearing community – no more “One Stop Shop”. Currently, advocacy and regulatory functions all contained within the Deaf and Hard of Hearing Commission.
- Fails to address desire for a pro-active, advocate service model for the deaf and hard of hearing community. IDFPR investigation actions will mostly result from complaints about licensees. Disciplinary actions will only occur if complaints are substantiated. Past



experience concludes that a majority of complaints are not substantiated to the point of requiring discipline.

IDFPR is bound by union contractual agreements, civil service rules, etc. in determining salary and compensation structure for its employees dealing with sign language interpreter licensure.

#### Recommendations:

IDHHC has historically been responsible for the regulation of sign language interpreters since the Interpreters for the Deaf Registration Act which was repealed upon the passage of the Interpreter Licensure. IDHHC agrees IDFPR's infrastructure is more comprehensive and streamlined. However, IDHHC has worked closely with IDFPR in developing the Interpreter for the Deaf Licensure program to ensure its administration parallels to other licensed professions in Illinois.

Sign language interpreters are a unique profession to regulate because it requires not only the ability to communicate directly with the Deaf community, but also an understanding of Deaf culture and impact on the community. During the first 10 years of licensure, IDHHC has noted the following improvements:

- The number of licensed interpreters have increased by 11%
- Provisional Licensed interpreters has decreased by 56%;
- Intermediate Proficiency Level interpreters has increased by 20%;
- Advanced Proficiency Level interpreters has increased by 27%;
- Master Proficiency Level interpreters has increased by 8%;
- Establishment of IL Board for Evaluation of Interpreters Certification; and
- Testing opportunities for Cued Speech providers starting the Spring/Summer of 2018.

To transfer the administration of the Interpreters for the Deaf Licensure Act of 2007 fully to IDFPR is an unnecessary response to the current concerns. IDHHC has demonstrated it can adequately address licensure issues, including future improvements to streamline its administration of the licensure program. Keeping Interpreter Licensure at IDHHC, also avoids uncertainty related to the following:

- IDHHC leases the Board for Evaluations of Interpreters (BEI) Exam from the DARS. Outside of the national test by the Registry of Interpreters for the Deaf (RID), the BEI is the only other performance based test for community interpreting. This test is different from most licensing exams in that there is both a written component and performance based exam which is videoed. Currently, this exam has only been leased to other deaf and hard of hearing governmental agencies. The availability of this test is essential to the interpreting profession.
- Sign language interpreters are primarily independent contractors who are hired by service providers, not the deaf consumer. IDHHC currently provides an on-line directory of all licensed interpreters and contact information. This is essential for service providers, both

private and governmental, to locate and hire sign language interpreters. This directory is substantially different from IDFPR current license look-up, which is not sorted by geographic region nor does it provide contact information for the licensee. While IDFPR could provide a separate directory for sign language interpreters, service providers and deaf consumers will likely continue to seek these services from IDHHC resulting in increased demands on program staff to provide referrals to IDFPR for such information.

- Transferring the regulatory function to IDFPR will decrease staffing at IDHHC, but various programming functions will remain that impact both interpreters and the deaf community. IDHHC will remain responsible to educate service providers on their responsibility to provide effective communication under the Americans with Disabilities Act. For a deaf consumer who uses American Sign Language, this requires an appropriately licensed sign language interpreter. An interpreter coordinator with the knowledge and cultural awareness of the deaf community can handle this overlap between the advocacy and regulatory functions.

In coordination with the Governor's Office, IDHHC recommends keeping the regulatory function under the Illinois Interpreter for the Deaf Licensure Act of 2007. IDHHC proposes the following changes:

- 1- 3 months
  - fill the vacant Interpreter Coordinator Position;
- 12 months
  - Consult with the Department of Innovation and Technology improve the efficiency of processing licensure.
  - Implement online renewal for 2019
- 18 – 24 months
  - With the assistance of the Interpreter Licensure Board, develop survey to distribute to Illinois Licensed Sign Language Interpreters to receive feedback on the licensure process and Interpreter for the Deaf Licensure Act of 2007.
  - Collaborate with the Illinois Registry of Interpreters for the Deaf, Illinois Association of the Deaf and IDFPR to review the Interpreter for the Deaf Licensure Act of 2007 and its rules for updates;
  - Present recommendations to the Interpreter Licensure Board for feedback; and
  - Introduce legislation for required changes.

#### ***D. Consolidation with Department of Human Services***

The Senate Resolution inquires whether housing IDHHC within the Illinois Department of Human Services (DHS) will allow it to better serve the Deaf and Hard of Hearing community. IDHHC services are essential to ensuring the Deaf and Hard of Hearing community has communication access when obtaining services from both governmental and private entities. IDHHC's services are not limited to a specific segment of the population. IDHHC is an information and referral source to a broad spectrum of consumers including but not limited to Deaf, Hard of Hearing, DeafBlind, and parents of children with hearing loss. Consumers use a variety of communications methods including sign language interpreters, cued speech, CART services or other communication methods. IDHHC seeks to improve access to services provided by governmental and private entities through training and technical assistance.

One of the limitations IDHHC faces as an independent state agency is the myriad of administrative and reporting responsibilities. While housing IDHHC within DHS would provide IDHHC with additional staffing infrastructure, it does not eliminate the various administrative responsibilities. Due to the specialized nature of services, IDHHC would require staff with the ability to coordinate these responsibilities with DHS administrative staff. Such a consolidation may provide some minor administrative relief involving personnel, payroll, vouchers, and budget. If IDHHC's office space was relocated to an existing DHS space sufficient for IDHHC's needs, this would eliminate the need for IDHHC's current lease and provide a cost-savings of approximately \$36,000 annually.

However, the potential loss of autonomy could diminish IDHHC's statewide authority over improving or modifying systemic issues affecting the Deaf and Hard of Hearing community. IDHHC services apply to populations served by many different state agencies such as Department for Children and Family Services, Department of Corrections, Department of Aging, Illinois State Board of Education, etc. Other agencies may no longer see IDHHC as the subject matter experts creating roadblocks to providing intra-agency support, implementing statewide programs or establishing standards. Further, service providers such as attorneys, medical providers, law enforcement, local governments, may no longer regard IDHHC as the subject matter expert and be unwilling to follow its recommendations.

Another consideration is the impact on IDHHC's ability to make recommendations directly to the Office of the Governor. If IDHHC is a part of DHS, its recommendations would be reviewed by the Director of the Division of Rehabilitation Services, and the Secretary of DHS. This additional oversight could result in less focus on the specific needs of the Deaf and Hard of Hearing Community as the needs of the entire system for persons with disabilities would factor into any final decision made by the DHS Secretary.

## Recommendations:

Based upon the potential drawbacks, it is currently premature to pursue consolidating IDHHC under the DHS. It is recommended IDHHC remain an independent state agency. In coordination with the Office of the Governor, IDHHC proposes the following actions:

- 0 - 6 months
  - Commissioners will review the hiring and recruitment procedures necessary to fill the vacant Director position; and
  - Appointments to fill vacant and expired Commission positions.
- 6 – 9 months
  - Work collaboratively with Department of Central Management, relevant bargaining units, and Civil Service Commission to evaluate current job descriptions and possible reallocation of positions within the confines and honoring existing bargaining agreements.
  - Fill remaining existing staff positions.
- 12 - 18 months
  - Explore alternatives to consolidation to alleviate a portion of administrative burdens, allowing additional staff resources to focus on services.

## ***E. Underserved Population***

The Deaf and Hard of Hearing community as a whole is considered a low incident underserved population. Segments of this community face additional challenges and barriers due to specialized needs. These include, but are not limited to, the following:

- DeafBlind consumers;

In collaboration with DHS, IDHHC established the Support Services Providers for the DeafBlind Task Force from October 2012 – May 2015. Due to Illinois' ongoing fiscal challenges, the lack of new funding opportunities has presented the greatest challenge. IDHHC continues to work with DHS and the DeafBlind community to increase these critical services.

- Minimal Language Deaf consumers;

This segment of the population benefits greatly from the use of a licensed Deaf Sign Language Interpreter. A Deaf licensed interpreter works in a team with a hearing licensed interpreter. They possess native or near native fluency in American Sign Language. These interpreters have special training and/or experiences with using gestures, mimes, props, drawings and/or other tools to enhance the interpreting process with the client.

IDHHC worked with the Interpreter Licensure Board to provide licensing opportunities within the various license proficiency levels and increasing the number Deaf Licensed Interpreters in Illinois. IDHHC continues to provide professional development opportunities for Deaf Interpreters and those interested in becoming a Deaf Interpreter.

- Hard of Hearing consumers;

One of the greatest barriers of this segment is the ability to purchase hearing aids. The average cost of a hearing aid ranges from \$1,000 to \$5,000 per device. Most health insurance does not provide benefits for the purchase of hearing aids. If benefits are provided, it is often very limited and places most of the financial burden on the individual.

In past legislative sessions, IDHHC actively worked with other stakeholders on legislation mandating coverage. These efforts were defeated in part due to the passage of the Affordable Care Act (ACA).

IDHHC established the Communication Access Realtime Translation (CART) Task Force in 2011. IDHHC implemented 3 of 5 recommendations of the CART Task Force. During the FY 2016, the Task Force was scheduled to reconvene to evaluate the growth of the profession. During this time, IDHHC was unable to reconvene the Task Force due to the budget crisis.

- Consumers utilizing Cued Speech

There are individuals with hearing loss who are not traditional ASL users that have adopted Cued Speech as a method of communication. Cued Speech utilizes various handshapes to assist the user in distinguishing English sounds in conjunction with lip reading. Both consumers and service providers have requested a listing of individuals who are certified/licensed in Cued Transliterating Services. Upon the recommendation of the Interpreter Licensure Board, IDHHC pursued offering the TECUnit Cued Certification exam. IDHHC will begin administering this test in Spring/Summer of 2018. Additionally, IDHHC has provided workshops to increase awareness of Cued Speech techniques and how they are used.

- Multi-Cultural Deaf consumers

Individuals with hearing loss who are not traditional ASL users which use foreign sign language systems. These individuals are often in pockets near large metropolitan areas. As their communication needs are diverse and the Interpreter for the Deaf Licensure Act of 2007 does not regulate foreign language sign language interpreters the use of a deaf licensed sign language interpreter is necessary to effectuate communication.

Recommendations:

In coordination with the Office of the Governor, IDHHC recommends hosting a forum with various stakeholders including, but not limited to, representatives from the Illinois Association of the Deaf, Illinois Registry of Interpreters for the Deaf, Chicagoland DeafBlind Alliance, Illinois Chapter of the Association of Late Deafened Adults, Illinois Chapters of the Hearing Loss Association of America, and Illinois Network of Centers for Independent Living to identify the needs and priorities of the various segments of Deaf, Hard of Hearing and DeafBlind community.

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## *Appendices*

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### **A. (20 ILCS 3932/) Deaf and Hard of Hearing Commission Act.**

(20 ILCS 3932/1)

Sec. 1. Short title. This Act may be cited as the Deaf and Hard of Hearing Commission Act.

(Source: P.A. 89-680, eff. 1-1-97.)

(20 ILCS 3932/5)

Sec. 5. Definitions. As used in this Act, unless the context requires otherwise:

"Chairperson" means the Chairperson of the Deaf and Hard of Hearing Commission.

"Commission" means the Deaf and Hard of Hearing Commission.

"Director" means the Director of the Deaf and Hard of Hearing Commission.

"Vice-Chairperson" means the Vice-Chairperson of the Deaf and Hard of Hearing Commission.

(Source: P.A. 89-680, eff. 1-1-97.)

(20 ILCS 3932/10)

Sec. 10. Commission. The Deaf and Hard of Hearing Commission is created as an executive agency of State government. The Commission shall be composed of 11 members, governed by a chairperson, and headed by a director.

(Source: P.A. 89-680, eff. 1-1-97.)

(20 ILCS 3932/15)

Sec. 15. Commission membership.

(a) The Commission shall be composed of 11 voting members appointed by the Governor from residents of the State whose position, knowledge, or experience enables them to reasonably represent the concerns, needs, and recommendations of deaf or hard of hearing persons. At a minimum, 6 voting members of the Commission shall be persons who are deaf or hard of hearing. The Chairperson of the Commission shall be elected from the Commission's membership by a simple majority vote of the total membership of the Commission. The Vice-Chairperson of the Commission shall be elected from the Commission's membership by a simple majority vote of the total membership of the Commission.

(b) The Governor shall consider nominations made by advocacy groups for the deaf and hard of hearing and

community-based organizations.

(c) Of the initial members appointed by the Governor, 3 shall be appointed to terms of one year, 4 shall be appointed to terms of 2 years, and 4 shall be appointed to terms of 3 years. Thereafter, all members shall be appointed for terms of 3 years. No member shall serve more than 2 consecutive terms. A member shall serve until his or her successor is appointed and qualified.

(d) Initial members' terms of office shall be chosen by lot at the initial meeting of the Commission.

(e) Vacancies in Commission membership shall be filled in the same manner as initial appointments. Appointments to fill vacancies occurring before the expiration of a term shall be for the remainder of the unexpired term.

(f) Members shall not receive compensation for their services but shall be reimbursed for their actual expenses incurred in the performance of their duties plus up to \$50 per day for any actual loss of wages incurred in the performance of their duties.

(g) Total membership consists of the number of voting members, as defined in this Section, excluding any vacant positions. A quorum shall consist of a simple majority of total membership and shall be sufficient to conduct the transaction of business of the Commission unless stipulated otherwise in the by-laws of the Commission.

(h) The Commission shall meet at least quarterly.  
(Source: P.A. 93-647, eff. 6-1-04.)

(20 ILCS 3932/20)

Sec. 20. Director. The Director of the Commission shall be hired, supervised, evaluated, and terminated by the Commission. The Director shall carry out the policies, programs, and activities of the Commission. The Director shall employ, in accordance with the provisions of the Illinois Personnel Code, manage, and organize the staff of the Commission as he or she deems appropriate.  
(Source: P.A. 93-647, eff. 6-1-04.)

(20 ILCS 3932/25)

Sec. 25. Powers and duties of the Commission. The Commission shall be a coordinating and advocating body that acts on behalf of the interests of persons in Illinois who are deaf or hard of hearing, including children, adults, senior citizens, and those with any additional disability. The Commission shall submit an annual report of its activities to the Governor and the General Assembly on January 1st of each year. The Commission shall:

(1) Make available and provide an educational and



informational program through printed materials, workshop and training sessions, presentations, demonstrations, and public awareness events about hearing loss for citizens in Illinois and for public and private entities. The program shall include, but not be limited to, information concerning information and referral services, lending libraries, service and resource availability, the interpreter registry, accessibility and accommodation issues, assistive technology, empowerment issues, obligations of service providers and employers, educational options, and current federal and State statutes, regulations, and policies regarding hearing loss.

(2) Cooperate with public and private agencies and local, State, and federal governments to coordinate programs for persons who are deaf or hard of hearing.

(3) Provide technical assistance, consultation, and training support to start and enhance existing programs and services for persons who are deaf or hard of hearing.

(4) Evaluate and monitor State programs delivering services to deaf and hard of hearing persons to determine their effectiveness; identify and promote new services or programs whenever necessary; and make recommendations to public officials about changes necessary to improve the quality and delivery of services, programs, and activities and about future financial support to continue existing programs and establish new programs.

(5) Monitor State funded programs delivering services to persons who are deaf or hard of hearing to determine the extent that promised and mandated services are delivered.

(6) Review, evaluate, and participate in the development of proposed and amended statutes, rules, regulations, and policies relating to services, programs, and activities for deaf and hard of hearing persons and make recommendations on existing statutes, rules, regulations, and policies to the Governor, General Assembly, and State agencies.

(7) Promote cooperation among State and local agencies providing educational programs for deaf and hard of hearing individuals.

(8) Establish rules and regulations related to evaluation, certification, licensure, and training standards of interpreters for deaf and hard of hearing persons.

(Source: P.A. 93-647, eff. 6-1-04.)

(20 ILCS 3932/30)

Sec. 30. Rules and regulations. The Commission shall promulgate rules and regulations to implement this Act in accordance with the Illinois Administrative Procedure Act.  
(Source: P.A. 93-647, eff. 6-1-04.)

(20 ILCS 3932/905)

Sec. 905. (Amendatory provisions; text omitted).  
(Source: P.A. 89-680, eff. 1-1-97; text omitted.)

(20 ILCS 3932/910)

Sec. 910. (Amendatory provisions; text omitted).  
(Source: P.A. 89-680, eff. 1-1-97; text omitted.)

(20 ILCS 3932/999)

Sec. 999. Effective date. This Act takes effect January 1, 1997.  
(Source: P.A. 89-680, eff. 1-1-97.)

**B. Public Comments**

- i. E-Mails sent to [dhh.suggestionbox@illinois.gov](mailto:dhh.suggestionbox@illinois.gov)

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Tuesday, October 31, 2017 11:06:34 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** I disagree with the IDHHC being moved under DHS. I disagree with the interpreter licensure being moved to IDFPR because this is a specialized area that IDHHC has the experts in. Will IDFPR have that? That's a huge concern. And the chance of fees increasing is another huge concern. This is a small group, not like the dental group or medical group, or nursing group. The interpreter group is very small. If it is moved, then the fees increases, I'm afraid we will lose even MORE interpreters. We are already struggling with interpreters in our state. Don't make it more difficult than it is. I would like for the Governor to stop asking small agencies like IDHHC to give back certain % amount of the budget like they have had in the past. The budget cuts has prevented the IDHHC staff from being able to provide services, meeting the 8 mandates. When the staff struggle with being able to do their job fully due to lack of budget, the Deaf and Hard of Hearing community suffers too. Stop taking the budget since this is a very small agency for the whole state of Illinois. Thank you.

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Thursday, November 02, 2017 8:21:34 AM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** As a deaf person, and a disability advocate, I believe that it is imperative that several things be accomplished. First it is imperative that the hiring freeze be addressed. It is impossible to address the diverse needs of the deaf, hard of hearing, and DeafBlind Communities without the staff available to address them. A commission that is understaffed, burnt-out, or unable to take necessary actions to better our state is of no use to our community. Secondly, the community needs more information in regards to potential impacts of the transfer of administration of the IL Interpreter for the Deaf Licensure Act of 2007 to the Department of Financial and Professional Regulation. Regardless, I believe that the IDHHC should post information that is not only in ASL, but captioned, about the potential effects of this for Deaf, DeafBlind, and Hard of Hearing stakeholders. Third, I believe that the IDHHC should be housed in the Department of Human Services, I fail to see how a move would benefit stakeholders, unless the IDHHC intends to expand its services

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Wednesday, November 01, 2017 8:04:06 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** If licensure is moved under the financial department, will those managing it understand deaf culture and the purpose of and necessity of having licensed interpreters?

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Wednesday, November 01, 2017 7:44:33 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** I'm concerned about licensure moving to IDFPR- will not be good for interpreter licensure for many reasons I do not think that IDHHC will best serve the community by being under DHS

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Friday, November 10, 2017 8:33:38 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** I recommend you to add 504 coordinator hospital for deaf patients who complaint for the interpreters who did not attend any hospitals while the deaf patients want to communicate with the medical staff or doctors. I suspect that the medical staff or doctors might be lie to deaf patients to appt for an interpreters with them in any hospitals. You know that the communication access is very important for one of CEJ (Communication Access, Education and Jobs) that what deaf people who need. The 504 coordinator hospital will be responsible for their job to collection data of the deaf patients who complaint and report to direct the IDHHC committee. The IDHHC would be collect from the 504 coordinator's report to direct our Illinois Gov. office. I just offer my idea for add the resolution to you. Thank you Tim Carroll

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Wednesday, November 15, 2017 11:47:06 AM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** I would like to know the response to the questions members submitted via IRID. Please respond so that licensed interpreters have facts about how this change will impact us. Thank you. Angela Trull Sign Language Interpreter IL Master License

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
Responses are not monitored.

**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Monday, December 04, 2017 6:13:22 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** Please do NOT support SR0528! Deaf, Hard of Hearing and DeafBlind individuals in the State of Illinois would NOT be better served by DHS. This is a specialized group that is culturally and linguistically different from other disability groups. DHS is not prepared and does not have resources to serve this special population. Interpreters would NOT be better monitored via the IDPR. IDPR is not familiar with the very specialized skills required to become competent in the interpretation of American Sign Language and the cultural skills that are required.

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This email was automatically sent from the SOI Feedback web part on the IDHHC site.  
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**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Friday, December 08, 2017 10:26:30 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** I am opposed to putting IDHHC under the Dept. of Human Services. This would add a layer of bureaucracy & would also take away the independence of IDHHC as a separate commission. I also oppose transferring Licensing of Interpreters to the Dept. of Financial & Professional Regulation. Interpreter licensing needs to stay under IDHHC which is intimately acquainted with the needs of the Deaf, Hard of Hearing, & Deaf/Blind & not be administered by a neutral agency that has no specialization in the needs of the Deaf community.

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Responses are not monitored.



**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Sunday, November 26, 2017 6:16:04 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

**Comments:** To whom it may concern, As a member of the Deaf community, I would like to provide you with my thoughts on the Senate Resolution 0528 and the current state of Illinois Deaf and Hard of Hearing Commission (IDHHC). As a Deaf community member who have contacted and sought services from IDHHC, my videophone calls, video messages, and emails went unanswered for weeks and weeks. When my contact was finally answered by the Assistant Director or the Director, I was not given the appropriate resource or clear answers to questions I had about the Interpreter Licensure Act. This is not a unique phenomenon as other Deaf, Deafblind, and Hard of Hearing individuals have shared their similar experiences. The failure of the IDHHC staff in serving the Deaf, Deafblind, and Hard of Hearing must end soon and it starts with instilling new Commissioners and new leadership at the agency. First of all, I have some recommendations on how to be re-position the IDHHC staff for success: • An independent performance evaluation of Janet Lambert in her Assistant Director position. Janet has worked for IDHHC for more than ten years and she, along with former Director John Miller, has proved to be ineffective in fulfilling the duties of her position. Janet has repeatedly told Deaf community leaders that by no means IDHHC is responsible for working with other state agencies to improve the accessibility of services and programs for our community. For instance, several Deaf community leaders raised some concerns on the lack of accessible mental health services for Deaf, Deafblind, and Hard of Hearing and we had a conversation with Janet about IDHHC working with the Division of Mental Health to address the issue. Janet said that it is not in IDHHC's purview to work with other state agencies in this kind of capacity and suggested that the Deaf community contact the Division of Mental Health instead. Janet chose to not take an action of any kind after a father of several Deaf children approached her with his and the Deaf community's concerns about the widespread shortage of qualified educational sign language interpreters in the state and how it is adversely impacting the quality of education for Deaf children. If you look at the past Commissioners meeting minutes, there is little indication of Janet's efforts to engage in a network of effective and positive relationships throughout the state or develop relationships with State and local government officials to promote organizational objectives as indicated in Janet's job description. • An agency of seven employees do not need a Director and Assistant Director position so IDHHC would be well served to retitle and reclassify the Assistant Director position to a position that will produce immediate benefits to the community such as an Information and Referral Specialist or Community Outreach Specialist. Having an Information and Referral Specialist or Community Outreach Specialist will help IDHHC meet the first three mandates as outlined in 20 ILCS 3932. • The Director position should be filled first before the vacant Interpreter Coordinator and the Program Coordinator positions are filled. • The restructure of the IDHHC organizational chart. For an agency of seven people, IDHHC does not need three staff members who have supervisory duties so the Director should serve as the direct supervisor for the remaining six employees. In the past seven years, the Commissioners have failed to fulfill their fiduciary duties in supervising and evaluating the IDHHC Director and ensuring that IDHHC has satisfied the mandates on an annual basis as outlined in 20 ILCS 3932. In the past four years, the Commissioners failed to act on the concerns that were brought to their attention at the Commissioners meetings by the community. Numerous letters, e-mails, and Facebook messages were sent to the

Commissioners, including the Chair Dennis O'Brien and Vice-Chair Lori Krakora, and they did not respond back nor did they took the initiative to solicit feedback from our community and make an attempt to address the concerns. It took the Governor's Office request to prompt Dennis O'Brien into action and solicit feedback from the community for SR0528. Here are the following recommendations on what can be done to build a team of qualified Commissioners:

- Dennis O'Brien's term should not be renewed.
- Lori Krakora's term should not be renewed.
- Susan Dramin-Weiss's term should not be renewed.
- Haydee Garcia's term should not be renewed.

• When filling the vacant Commissioner positions, there should be a great emphasis on bringing in as many Deaf, Deafblind, and Hard of Hearing with diverse professional and/or personal backgrounds. At least we should have a parent of a Deaf/Hard of Hearing child, a Vocational Rehabilitation professional, a K-12 Deaf Education Teacher, a licensed sign language interpreter, a Human Services/ Center of Independent Living professional, and a Deaf person of color serve as Commissioners. IDHHC would stand to benefit from varying expertise of the Commissioners to better strategize on how to serve the Deaf, Deafblind, and Hard of Hearing community.

• After the Commissioner positions have been filled, the Governor's Office should send a representative to provide a training for the Commissioners on how to fulfill their fiduciary duties and what are their responsibilities in governing the Commission. The training has been previously provided by the IDHHC staff which has been proved to be inappropriate and inadequate considering how it has led the Commission to its current state. There are groups in the Deaf, Deafblind, and Hard of Hearing who have not been adequately served by IDHHC for years and the groups include Black Deaf individuals, Latino Deaf individuals, Immigrants or first-generation Americans who are Deaf, Deafblind, and Hard of Hearing, Late Deafened Adults, Deaf Senior Citizens, Hard of Hearing individuals, parents of infants who are Deaf, Deafblind, and Hard of Hearing. Here are the recommendations what you can do to better serve those groups:

- Appoint qualified Commissioners who come from the underserved groups.
- Redo the IDHHC Strategic Plan because the current strategic plan is inadequate and does not contain measurable goals and outcomes. The goal 4, objective 4.2 of the IDHHC's current strategic plan mentions that IDHHC should "Create a culture of support for underserved populations within the Deaf, Hard of Hearing and DeafBlind community." What does "a culture of support" mean? What kind of action and outcome is expected from the IDHHC staff to accomplish this objective? With how poorly written the strategic plan is, it is difficult to hold IDHHC staff accountable for specific goals and outcomes if the staff does not exactly know what they are expected to achieve! The Interpreter Licensure management should be self-sustaining with the interpreter licensure fees and the Interpreter Coordinator position. Instead, the IDHHC management has reallocated devoted significant agency resources to manage the interpreter licensure, at the expense of the Deaf, Deafblind, and Hard of Hearing community. Here are my recommendations on what needs to be done with the Interpreter Licensure:
- Move the Interpreter Licensure management and the Interpreter Coordinator to the Department of Financial and Professional Regulation. By having a qualified Interpreter Coordinator working in the IDFPR, there should be no concerns about having unqualified state personnel monitoring and managing the Interpreter Licensure and coordinating professional development opportunities for the interpreters. The Interpreter Coordinator would benefit in learning the best practices of managing licenses applications, renewals, and complaints from the IDFPR.
- If the Licensure is moved to IDFPR, the current Interpreter Licensure Board must continue to exist and the Board members must include the sign language interpreters and consumers who use sign language interpreters. Even though the current Commission lacks the effective leadership and competent staff, the current issues are the ones that do not warrant a drastic decision such as moving the Commission to the Department of Human Services. IDHHC should continue to retain its Commission status, governed by qualified Commissioners who fully understand their fiduciary duties. None of the



IDHHC staff should be given any kind of access to the selection process for the vacant Commissioner positions. This minimizes the incidents of cronyism that has plagued the Commission for the past seven years. In conclusion, the necessary changes must start with the appointment of new, highly qualified Commissioners who are committed in providing a sound governance of IDHHC and ensuring that the IDHHC meets the legal mandates effectively. There is a need for a thorough performance evaluation of the current staff because IDHHC needs a team of staff members who are effective and efficient in leading the agency through a challenging time of change. A well-run Commission will eventually recognize that there are numerous opportunities for IDHHC to meet the needs of the community with the resources they have. For instance, Illinois does not have any funding sources to reimburse for interpreting and captioning services in situations where service providers are exempt from the ADA requirements (e.g. Alcoholic Anonymous meetings, community events hosted by a very small nonprofit agency with very limited budget, etc). With the changes taking place in a timely manner, I foresee that IDHHC will become a well-run agency that collaborates with other state agencies and Deaf/Deafblind/Hard of Hearing agencies in the benefit of our community. Thank you for your consideration. Cc: Governor Rauner A Senator A Representative Illinois Association for the Deaf

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Responses are not monitored

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**From:** ilext.sp2010.farm@illinois.gov  
**To:** [DHH.SuggestionBox](#)  
**Subject:** Feedback from IDHHC  
**Date:** Monday, December 04, 2017 6:13:22 PM

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New [Feedback](#) has been received on the [IDHHC](#) site.

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**Comments:** I am opposed to putting IDHHC under the Dept. of Human Services. This would add a layer of bureaucracy & would also take away the independence of IDHHC as a separate commission. I also oppose transferring Licensing of Interpreters to the Dept. of Financial & Professional Regulation. Interpreter licensing needs to stay under IDHHC which is intimately acquainted with the needs of the Deaf, Hard of Hearing, & Deaf/Blind & not be administered by a neutral agency that has no specialization in the needs of the Deaf community.

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Responses are not monitored



**From:** Ted Huber  
**To:** [DHH>Contact Us](#)  
**Cc:** [DHH Chat](#)  
**Subject:** [External] Illinois Senate Resolution 528  
**Date:** Saturday, December 30, 2017 1:12:45 PM

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December 30, 2017  
Governor Bruce Rauner  
Office of the Governor  
207 State House  
Springfield, IL 62706

Sent via email - Voice an Opinion. 12-30-2017

Dear Honorable Governor Rauner

Re: Senate Resolution 528

Please keep the Illinois Deaf Hard of Hearing Commission, IDHHC in your Governor's Office. I would appreciate it very much as it would provide me with much comfort and peace knowing that only your Office can provide rich resources in making the plan needed in Illinois.

I have been hard of hearing since birth and many of my friends in the Jacksonville area have the hearing loss. Recent results from the prestigious Academies, the National Academies of Sciences, Engineering, and Medicine 1863 congressional charter signed by Abraham Lincoln study issued June, 2016 show around 80 % of people who could benefit from hearing aids don't get them and it takes 7-10 years for a person to seek help after learning he or she has a hearing loss. Cost, access and stigma are a deterrent. Upon request, I would be very happy to share the results and its recommendations.

The Governor's Office would be a MUCH BETTER governmental body in Illinois to address this concern. I personally feel your directives with the developed Plan would address this serious need in Illinois.

I look forward to working with you and your staff.

Thank you for your concern.

Theodore G. Huber  
1708 Linden Street  
South Jacksonville, Illinois 62650-3210  
An advocate for us who have a hearing loss.

**'Nothing About Us Without Us'** quoted from Nelson Mandela  
Please invite us whenever you are discussing about us. I would appreciate this.

cc:

Honorable Illinois Senator Sam McCann  
District Office  
221 Dunlap Ct  
Jacksonville IL 62650  
[SenatorMcCann@gmail.com](mailto:SenatorMcCann@gmail.com)

Honorable Illinois Representative C.D. Davidsmeyer  
District Office  
325 W State St, Suite 102 P.O.  
Box 160  
Jacksonville IL 62650  
[repcdavidsmeyer@gmail.com](mailto:repcdavidsmeyer@gmail.com)

Barbara Kelley, Executive Director  
Hearing Loss Association of America  
7910 Woodmount Avenue, Suite 1200  
Bethesda, MD 20814  
[hearingloss.org](http://hearingloss.org)  
[bkelly@hearingloss.org](mailto:bkelly@hearingloss.org)

(I believe, this H.L.A.A is the only consumer-group sponsor of the hearing health care for adults in the United States study conducted by the Academies.).

Corey Axelrod, President  
Illinois Association of the Deaf  
P O Box 2161  
Palatine IL 60078

ii. Video Message Summary

**11/20/2017 12:48 p.m. Video Message from Tom Bruhn:** Hello it was nice to meet the IDHHC staff at the IDHHC commission meeting held yesterday I think you did a wonderful job explaining the points at the meeting it was very clear. I have 3 points regarding SR0528.

- 1) My first point may not be related specific to SR0528 but I still want to share with you. The appointment process to be on the Commission as a Commissioner is questionable. I have previously applied and I know several other people have applied and we have heard nothing. I have sent over a FOIA request to the Illinois Attorney General's office wanting to know the procedures of the commission appointment and how it is supposed to work.
- 2) About the possibility of moving Interpreter Licensure to IDPFR I am ok with this move only IF the regulation authority remains intact as it was under IDHHC and the authority to license interpreters remains.
- 3) IDHHC moving under DHS I believe is a bad idea as this will minimize the deaf community and their needs. It will also put a IDHHC under a larger agency that does not understand the community needs and the perspective that hearing individuals will decide what the Deaf community needs.

Thank you.

**11/20/2017 12:52 p.m. Video Message from Tom Bruhn,** I did forget to add one thing. I wanted to say that I think 3 staff at IDHHC is not enough. There is too much work that is needed for this small staff. I remember I saw on the PowerPoint that there were 2 positions currently vacant. Interpreter Coordinator position and Program Coordinator and then there is the position of the Director. I would prefer that the positions be filled with deaf individuals so that they can communicate directly with the deaf community.

**12/11/2017 9:25 a.m. John Miller,** video message: Good Morning, Hello, I am furious more than furious that the Illinois Association of the Deaf(IAD) has been has been publicly campaigning over and over again to the Deaf community to NOT to send their public comments to IDHHC. They are encouraging the community to instead send public comments directly to the Governor's office.

I am furious "pissed off" this campaign shows a LACK of COLLABORATION from IAD. I want this on record I am very UPSET with IAD and I want the Governor and the General Assembly to know that IAD is doing everything they can to avoid and go around IDHHC which is WRONG! I want my objection documented.

Secondly, I have a lot to comment about SR0528 and the Sorenson Video Message set up is limited to only 2 minutes, I don't like that my time is limited to 2 minutes. I have a lot to say and the 2 minutes is not enough. I am not sure how you want to handle this. Can you please email or call me to discuss how I can make my comments again, 2 minutes is not enough time?

## **12/1/2017 Joh Miller Video Comment:**

Hello, I want to talk about SR 0528 Senate Resolution 528. Before I go thru each section of the resolution. I would like to express my complete and utter disgust and file an objection against the Illinois Association of the Deaf (IAD).

IAD is actively out there campaigning and encouraging the community to NOT SEND their feedback or comments on SR0528 to IDHHC. Encouraging people to send the comments directly to the Governor's office. IAD talks big about how it's important to collaborate and work together. However, their actions show the opposite. This is my objection with IAD.

I am a member of IAD and I am very ASHAMED to be a member. My membership will expire in February and it is my intent NOT to renew my membership because they do not represent me and IAD is a very self-serving organization and a very DEAF MILITANT thinking organization.

They fail to take into consideration hard of hearing individuals, DeafBlind, or children who have special needs, or those who use cueing, or a Parents Right to have CHOICES. They believe their WAY is the only WAY. I cannot support that and the biggest impact and reason for this resolution is because of IAD and how they have pushed hard for this. I must publicly mention that I am NOT going to support IAD in their goals or mission.

Now I would like to move on and discuss the resolution. Please be patient with me as I reference my notes as I did not study or memorize these points.

I would like to know has IDHHC or the Governor Rauner's office outreached to the following groups/organizations: DeafBlind organization, Hard of Hearing organizations that serve this population like the Hearing Loss Association of America (HLAA), or the Association of Late Deafened Individuals (ALDA) I think it is important to outreach to these organizations. Also, have you outreached to the Parent's Organization. Parents are a huge asset to IDHHC.

Have you outreached to the Interpreting organizations? IDHHC is the regulatory body for interpreters have you gone out and asked them to provide feedback? Have you heard their feedback?

This is critical to getting good information. If you limit public comments only to what people send in to IDHHC this will not be successful. I believe that IDHHC needs to go out into the community to gather that information. I think there are a lot of people out there that we need to include and listen to their feedback about what should be important to the Commission.

As you know I have already written a letter to the Governor and the Chair of IDHHC. I will share this letter with Janet via email.

I am very proud of the Commission and what they have accomplished over the past 13 years. It is unbelievable what the Commission has accomplished especially with the challenges of budget reductions and staffing shortages. The Commission has done a lot and I applaud the Commissioners and I support the Commission 100% and will continue to give my support for this agency. Words cannot truly express the appreciation for all the work the Commission has done.

As I feel it is important to acknowledge all the accomplishments. However, please understand the letter was to highlight the successes and is not inclusive of everything that was accomplished I did not include the information and referral services as well as working with community to provide resources. It is impossible to cover everything in my public comments.

SR0528 Resolution question #1 Hiring Freezes placed on the Commission.

#1 I can tell you the issue of the hiring freezes was truly an issue years and years ago. Once Rauner came into office this was not an issue.

I am pleased to say that we were able to move forward and did fill the office assistant position. We also posted and interviewed for the Interpreter Coordinator Position and I believe the interviews were conducted in March or April. The decision to hire was made and we were getting ready to make the offer, however due to the IAD/IRID conference that was being held in June we decided to wait to make the offer until July. I contacted the candidate and asked him in July if he was ready to accept the offer and he told me yes, he was. I then followed up with Patty and requested that she please make the official offer. Patty told me no! When I asked her why not! Patty indicated that since Tonia, Legal counsel had gone thru the Rutan training she felt that we had done something wrong. I informed Patty that I objected and disagreed with Tonia's advice. My reason for disagreeing with Tonia was the fact that I along with Patty and Janet had followed the same procedure as we had always done. We had been thru the Rutan training and had the assistance of CMS and that I did not see anything that we had done wrong and I did not agree with Tonia's opinion. Patty refused and I considered that refusal insubordination. She did not make the offer for hire to the potential candidate. I was placed on Administrative Leave I decided to contact the potential candidate and inform him that I was on Administrative Leave and that I was not sure of what the Commission would be doing at this point. The candidate responded by say WHAT! And then he told me he was withdrawing his application. That was the biggest disappointment of losing this candidate and the reasons why this happened I don't know!

I am sure they have their reasons but they didn't share them with me.

I am happy to find out that the position is now posted and I am happy to see them moving forward but the position should have been filled a long time ago.

We all as part of the management team consisting of myself, Janet, Tonia, & Patty decided that we would focus on filling the position of the Interpreter Coordinator first and then move on to the Program Coordinator position.

I did have someone in mind for the position and Tonia expressed her objection and that she didn't want that person having the position. I told her I understood her feelings but that we would move forward and go thru the Rutan interview and selection process. I felt it would take care of itself. Tonia response was very immediate and very upset she immediately said FINE! then you need to supervise that position! That was rather a surprising reaction coming from Tonia I was rather disgusted with her reaction especially as Legal Counsel. Rather than continuing to argue with her at that point I told her that was fine that we could look at

restructuring the supervisory function back under me as the Director. That was the end of the discussion.

We were getting ready to move forward and post the position and then again, Tonia immediately stated no we can't post the position. She was never able to "clearly" explain why and to this day I still don't understand why we couldn't post the position. I was placed on administrative leave and it did not move forward.

I was thrilled to recently see the positions posted for the Interpreter Coordinator and Program Coordinator positions.

However, I was a little confused as IDHHC posted both positions at the same time? But previously they had indicated that it would be too overwhelming to post/fill both positions at the same time. That was a direct conflict of what they said to me in the past.

However, it doesn't matter I do support the Commission moving forward and filling the positions because there is a huge need to fill them. I admit that I was not happy with the way it was handled and how Tonia interfered in the process that was my biggest disappointment that I had with her.

#2 Limitations that OMB or the Office of the Governor or Department of Central Management services. Yes! there were a lot of challenges. Especially when a new administration takes over and there is a lot of changes that occur and that can be time consuming in trying to meet their request. However, I believe the Commission satisfied their request and followed those things accordingly and met their expectations. At times, the requests were time consuming and sometimes frustrating yes, we were short staffed but at the same time I don't think it was disruptive in what needed to be done.

#3 In talking about the possibility of transferring licensure under IFDPR my first reaction is a very large (finger spelled) NO! and a very loud NO. I will continue to say NO!

I think that will completely destroy the voice of the Deaf consumer who might have a complaint against the interpreters. Because once it gets to IFDPR then COMMUNICATION becomes the issue and the BARRIER! At that point at IFDPR it then becomes an issue of hiring an interpreter and now you have another interpreter who will be involved in the complaint process against another interpreter. This causes massive confusion and further complicates the process.

With licensure at IDHHC the communication is fully accessible the consumer can file their complaint in their native language using ASL.

The investigation and interview will be done thru direct communication using American sign language rather than having to use an interpreter which then involves a 3rd party in the process which also increase costs to the Interpreter licensure fund.

I am expressing my very strong opposition to transferring licensure to IFDPR.

Secondly, IDHHC has done MORE than just regulation, IDHHC has also provided certification opportunities to improve interpreter skills. Which means that if Licensure does transfer to IFDPR there are no certification opportunities in place. Where will Interpreters go to take the test? There is no other test in Illinois. The only other test that is offered is the National test and that is NOT offered here in Illinois. How can the Interpreter have an opportunity to show proof of their improved skills?

IDHHC has the Board for Evaluation of Interpreters (IL-BEI) Certification and it does provide interpreters the opportunity and incentive to show that they have improved their skills with this certification. This process needs to continue at IDHHC and I am in STRONG OPPOSITION TO TRANSFERRING LICENSURE.

IDHHC has been working very hard and partnered with the Illinois State Board of Education for a long time. Although, ISBE focus is primarily on individuals having appropriate certification and approval that reflects their skills to Interpret for children in the k-12 setting. IDHHC focuses primarily on individuals that provide interpreting services out in the Community.

Both agencies have worked together to develop an agreement to provide workshops that are concentrated and specialized to the field of Interpreting, that were affordable, were centrally located in the state, and several times it provided as much as 20 hours in one weekend setting.

These workshops were recognized by both Agencies to satisfy not only licensure requirement but also ISBE professional development requirements.

Transferring licensure to IFDPR this opportunity will be lost and then Interpreters must travel sometimes out of state to get their professional development hours.

If the workshops are offered in Illinois they are for limited number of hours which requires more expense and time for interpreters to attend several workshops rather than getting them all at one time.

However, IDHHC and ISBE collaboration offered one workshop one weekend earning sometimes at least 20 hours. I feel very strongly in supporting licensure regulation, certification and professional development within IDHHC.

Transferring licensure will not help the situation and I am deeply concerned about how this will impact interpreters.

#4 Transferring IDHHC under DHS. My first reaction is NO!

Often DHS has security stationed at their offices and this can create additional communication barriers. Consumer comes in and then security does not know how to communicate. I am not saying that this cannot be addressed however, it will place additional duties and responsibilities on security personnel and could impact especially with labor union issues.

IDHHC is small enough that the agency is accessible to the Deaf community. There is not the additional hassle of being placed in a large agency where a person must then be escorted to the 3-4 floor down the hallway etc.....

My simple response is keep IDHHC independent of DHS.

4a Will moving IDHHC to DHS be advantageous to have DHS staff provide administrative support and resources.

In theory, this sounds good but in actuality they will probably do the same thing that CMS does and that is charge the agency for their services. We utilize their labor, their IT, their experts, their telecommunications and in turn they “BILL” for those services back to the agency.

How is this any different and how does this save any money.

If the service is free maybe that would be different but if they are going to charge why then go thru the process of moving? It might reduce the burden on the staff but how does it save money? It doesn't.

4b. If these administrative duties were transferred would it allow staff more time to focus on advocacy issues? It would be hard to answer this question. Because for many years the Commission was not able to fill positions, there were freezes but then other issues would cause the process to be stalled or put on hold for whatever reasons.

I think until IDHHC has a full staff then we can evaluate to see if the agency is successful. If the agency is successful, then this section is a moot point. If the agency is not successful, then at that point we need to identify how to use other identify and use other resources.

For example, maybe IDHHC can utilize or take into consideration to use the Governor's office resources such as their Legal Counsel. That would allow the Legal Counsel position at IDHHC to be changed to a different position that can focus on other things.

In my opinion, the Legal Counsel here at IDHHC is controlling the Commissioners, is controlling the Director, is controlling the Assistant Director, is controlling the Personnel Officer because we all do not know the “LAW” and therefore depend on that Legal Counsel and that is totally WRONG!

This position should be advising, helping, assisting and supporting that's it.... But that is not what happened here at IDHHC.

If we utilize the Governor's Legal Counsel maybe that will become a more neutral legal support and then the position here at IDHHC can be utilized for different duties.

This will then give the power back to the Director as it should be.

## #5 Identify underserved

We recognize the following groups: Deaf, Hard of Hearing, DeafBlind, Interpreters, Educational Interpreters, Parents of Children with hearing loss, Educators for the Deaf and Hard of hearing, not only the Educators at the residential school but all educators throughout the state who provide services to children in the public schools. There is a lack of resources available and there is also a lack of qualified teachers.

We also recognize other areas of the state for example; the Department of Children and Family Services has a Statewide Deaf Services coordinator however, she is only one person. Another

wonderful Statewide Deaf Services Coordinator in the state is at the Office of Mental Health but again she is only one person.

Obviously, there is a lot of work to do and to identify however, the Commission can only do what it can do with the budget and staff it is given currently. We have a lot of things to do and we can do so much more.

Thank you.

I believe I have responded to all 5 sections and I have only one more thing to add PLEASE DO NOT rely upon only IAD. They do not SPEAK for everyone. Please contact the hard of hearing community, late deafened community, DEAFBLIND, parents, educators, Supervisors of the Educators, outreach to Educational Interpreter, to Sign Language Interpreters, outreach to everyone you will be amazed at what they have to say. Please consider this request.

I offer my support and services to the Commission. I still believe that the Commission can do more and I completely support the vision of IDHHC.

Thank you for your time in hearing my comments.



### iii. Letters



*"The world has watched the deaf community come of age. Together we've overcome our own reluctance to stand up for our own rights."*

Dr. I. King Jordan, President Emeritus  
Gallaudet University

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November 16, 2017

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Governor Bruce Rauner  
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Springfield, IL 62706

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Dear Hon. Governor Rauner:

##### **Secretary**

Leon Devriendt  
treasurer@iadeaf.org

The recent dismissal of John Miller as director of the Illinois Deaf and Hard of Hearing Commission (IDHHC) will not change much at IDHHC, and was a bit too late.

##### **Membership Secretary**

Elke Weinbrenner  
membership@iadeaf.org

In 2015, several commissioners attempted to address the multitude of long-standing issues at the IDHHC, issues that were present well before you became Governor. The IDHHC chair and vice chair at the time attempted to respond to multiple complaints regarding hostile work environments and vindictive behavior on the parts of John Miller and Janet Lambert, the assistant director at IDHHC. Suspensions were issued, but Gregory Bassi and Linda Lingle from your office intervened. Shortly after, the IDHHC director and assistant director returned to work, and you replaced the commissioners that took action.

##### **Member at Large**

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elopezjr@iadeaf.org

##### **Chicago Chapter of IAD**

Earl Weston  
CCIAD@iadeaf.org

Regardless of whether procedural errors were made, these commissioners recognized the fundamental issues with the IDHHC. It is unfortunate your office failed to be responsive in the first place; as a result, the issues with the IDHHC continued to spin out of control.

##### **Fox Valley Chapter of IAD**

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##### **Illini Chapter of IAD**

Shelley Williams  
Illini@iadeaf.org

We have witnessed a complete dereliction of responsibility by the commissioners you appointed to serve on the IDHHC. These commissioners, led by Chair Dennis O'Brien and Vice Chair Lori Krakora, have failed to fulfill their fiduciary duties. The commissioners had ample opportunities to address IDHHC's continuous failures in satisfying mandates established in law, but disregarded their responsibilities to address dismal staff performance and develop a plan of action to improve the agency's outcomes. Instead, commissioners continuously allowed the IDHHC staff to operate months at a time without needing to demonstrate any signs of improvement.

##### **Jacksonville Chapter of IAD**

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##### **McLakes Chapter of IAD**

Tom Bruhn  
McLakes@iadeaf.org

The Deaf community has contacted your office on multiple occasions to stress the urgency of filling the vacant commissioner positions with competent individuals who have diverse professional and educational backgrounds. To this end, the current commission is not reflective of the Deaf, DeafBlind and Hard of Hearing community or the professionals that serve the community in question. A fully represented commission, one with qualified and competent individuals, that can provide appropriate oversight to an equally qualified and competent director would result in better outcomes than hastily moving IDHHC under the Department of Human Services' (DHS) purview.

IDHHC staff members also inappropriately authorize decisions for the agency, decisions that are supposed to be voted on by commissioners. Recent meeting minutes do not show commissioners approving a budget proposal for FY19. Additionally, until the November 9<sup>th</sup> meeting, there were zero (0) commissioners meetings since May 2017. However, during the November 9<sup>th</sup> Commissioners meeting, the staff members announced they decided to proceed with implementing a system to test and license cued speech transliterators. A review of the last three years' IDHHC meeting minutes shows no vote from the commissioners to put this initiative in action. The staff's power overreach is concerning, a concern as commissioners have not taken action to address and implement control.

This is the latest in a long string of activities in which staff members exerted control over the commissioners, a byproduct of commissioners truly not knowing their legal obligation and authority.

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Commissioners have expressed concern about a severely outdated commissioner's manual and lack of new commissioner orientation training. Yet, IDHHC staff members continue to manipulate information shared with commissioners regarding their duties. For example, the November 10, 2016 training done by IDHHC attorney Tonia Bogener that was open to the public focused on the agency's roles and responsibilities in satisfying the mandates established in law. However, Ms. Bogener but did not discuss in-depth the commissioners' fiduciary and legal duties as a part of ensuring IDHHC satisfies the mandates in law.

Of additional concern was Ms. Bogener and Ms. Lambert's recommendation to the commissioners during the November 9, 2017 meeting that commissioners convene to issue their own concerns and recommendations via a separate letter after IDHHC worked with the Governor's Office to submit the report requested in SR528.

Why did Ms. Bogener and Ms. Lambert attempt to limit the commissioners' authority and exclude them from taking an active part in developing recommendations for the General Assembly as requested by SR528?

Ms. Bogener and Ms. Lambert's efforts to exclude commissioners is indicative of an ongoing pattern of staff members preventing commissioners from carrying out their fiduciary responsibility of representing and serving the deaf community. This is a blatant, intentional effort to diminish the powers of the commissioners.

Additionally, as our attorney expressed in his letter to your office dated November 2, 2017, our members are not confident the Commission would act in good faith and be transparent in collecting, disseminating and accurately reporting all comments received from the Community regarding SR528. As Ms. Bogener confirmed during the November 9th meeting, Ms. Bogener and Ms. Lambert would be the only two with access to all feedback given and be responsible for coordinating the translation of messages left in American Sign Language to written English. Considering IDHHC's staff recent history of retaliation when individuals advocated for better services and accountability, we encouraged our members to send feedback directly to your office.

It will not reflect well on your office that the two hearing staff members in question who have contributed to the problematic issues at IDHHC will lead the effort in working with the Governor's Office and make recommendations on what would be best for Deaf, DeafBlind and Hard of Hearing Illinoisans.

Given all of the above, it would be ill advised for Ms. Bogener and Ms. Lambert to have any involvement with developing recommendations for the report in question.

Our concerns are further perpetuated by the lack of transparency on Chair O'Brien's part. During the November 9<sup>th</sup> meeting, one of the commissioners asked Chair O'Brien who from IDHHC was working with the Governor's Office on SR528. Chair O'Brien, a commissioner you appointed, shared he did not have to answer this question. Why the secrecy from other commissioners who, along with Chair O'Brien, are responsible to oversee the IDHHC?

During several previous commissioner meetings, Chair O'Brien also made political statements and slandered organizations and individuals exercising their constitutional rights to petition the IDHHC, a government agency, for improved services. Our members shared concerns regarding this behavior with Veronica Vera, IDHHC's previous spokeswoman, and requested she share with your office. We also filed grievances directly with the Commissioners regarding Vice Chair Krakora's openly critical comments about organizations exercising their constitutional rights to petition government for redress of grievances. Chair O'Brien and Vice Chair Krakora's actions infringe upon Article 2, Section 3.4 of the IDHHC bylaws, which states, "The individual member's duties and responsibilities are to be objective in evaluating the programs, problems and policies of the commission."

Furthermore, Article III, Section II of the IDHHC bylaws stipulates the Chair and Vice Chair shall be "selected at the last regularly scheduled meeting of the calendar year." The last scheduled meeting for the 2017 calendar year was on November 9, 2017. This omission of an election was malfeasance and gross negligence on Chair O'Brien and Vice Chair Krakora's parts and could be interpreted as an abuse of power to extend their terms as officers.

All in all, Chair O'Brien and Vice Chair Krakora's conduct are commonplace within the agency. A reappointment of Chair O'Brien and Vice Chair Krakora as commissioners will not reflect well on your office and reelection campaign efforts.

Your term as Governor is not yet over. You still have time to act on reforms to improve the quality of life for Deaf, DeafBlind and Hard of Hearing Illinoisans. We hope you join leaders on both sides of the aisle to provide the IDHHC with new management, staff members and commissioners. We are also aware of your desire to move IDHHC under the Department of Human Services' purview; however, that is a reaction to the problem, not a solution. A new slate, not a move under DHS where IDHHC would lose its autonomy, is what the IDHHC needs.

We have several recommendations to cost-effectively streamline IDHHC's services and maximize the state's investment in providing resources to Deaf, DeafBlind and Hard of Hearing Illinoisans. We know what we need and what it will take. Unfortunately, these decisions are often left to non-Deaf individuals, resulting in millions of dollars being wasted yearly.

We are ready to meet with your office and share our recommendations.

Sincerely,

Illinois Association of the Deaf Board of Directors

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Corey Axelrod  
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*Kevin Ryan*

Kevin Ryan  
Vice President

*Leon Devriendt*

Leon Devriendt  
Secretary

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Illini Chapter Representative

*Joe Vieira*

Joe Vieira  
Jacksonville Chapter Representative

*Tom Bruhn*

Tom Bruhn  
McLakes Chapter Representative

Cc:

Senator Julie A. Morrison (via email)

Representative Michelle Mussman (via email)

Senator Sam McCann (via email)

Mr. Andrew Perkins, Chief Senate Liaison (via email)

Mr. Chris Kantas, Policy Advisor (via email)

Mr. Andrés J. Gallegos, Esq., Robbins, Salomon & Patt, Ltd.  
(via email)

Mr. Joe Linder, President, Association of Late Deafened  
Adults (ALDA) Chicago (via email)

Mr. Bryen Yunashko, President, Chicagoland DeafBlind  
Alliance (via email)

Ms. Deirdre Keane, President, Hearing Loss Association of  
America, Chicago Lincoln Park Chapter (via email)

Ms. Teri Hedding, President, Illinois Registry of Interpreters  
for the Deaf (via email)

Ms. Janet Tusk, President, Hearing Loss Association of  
America, Illinois Cochlear Implant Chapter (via email)

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John Miller  
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Sherman, IL 62684

November 13, 2017

Governor Bruce Rauner  
Office of the Governor  
207 State House  
Springfield, IL 62706

Dear Honorable Governor Rauner:

I would like to begin the letter by thanking you, the Commissioners, and the staff for allowing me to work as Director for Illinois Deaf and Hard of Hearing Commission (IDHHC) for the past 13 years. I learned that I was terminated effective immediately on November 9, 2017 without explanation. I was aware that as director I could be terminated without explanation. Naturally, I was devastated by the news of my termination especially since my passion for the deaf, hard of hearing, deafblind, and interpreters have only increased since I have begun my work 13 years ago at IDHHC.

I would like to highlight the accomplishments of IDHHC during my tenure as Director.

- IDHHC has developed the Parents Manual on hearing loss to be distributed through the Newborn Hearing Screening to provide parents information of the resources and services available in Illinois. IDHHC has since stopped providing this service directly due to an organization providing similar services. This decision has saved time, energy, and printing costs for the Commission. IDHHC supports CHOICES for Parents in their distribution of resources. They do an outstanding job in keeping information up to date.
- IDHHC took the lead in developing a legislation bill establishing the Interpreter Licensure. This was an initiative IDHHC pursued after recommendation from the Interpreter Working Group and 14 town hall public meetings. The legislation bill was passed in 2007. The Interpreter Licensure Board was selected immediately and they began to develop procedures and rules with public input through town hall meetings. The Interpreter licensure requirements began on January 1, 2009. The establishment of the licensure has created job opportunities for interpreters and also gave deaf consumers the right to receive the appropriate interpreter services according to their own communication effectiveness. In addition, this gives the incentive to interpreters to improve their skills to advance their level.
- IDHHC with the assistance of the Illinois Department of Financial and Professional Regulation established procedures for the filing and investigation of interpreter complaints.
- The Interpreter Licensure Board recognized that there was a lack of testing available for interpreters in Illinois and made the recommendation to explore testing options. After exploration, the Interpreter Licensure Board recommended that IDHHC adopt the Board of Evaluation for Interpreters (BEI) that was implemented in the state of Texas. IDHHC negotiated an agreement with Texas to bring the BEI to Illinois in order to administer tests in Illinois.

1

- Illinois State Board of Education formerly only recognized the Educational Interpreter Proficiency Assessment (EIPA) for educational interpreters in the school system. The EIPA was limited to the availability of testing. IDHHC worked with ISBE and decided that the BEI is sufficient for educational interpreter testing requirement. ISBE now recognizes the BEI and EIPA as suitable assessments of educational interpreters.
- ISBE and IDHHC have collaborated in hosting annual conferences in order to provide all interpreters professional development opportunities so that they can achieve the required 20 credit hours per year.
- IDHHC took the lead in the maintenance of the CART Services Task Force. CART Services Task Force was recommended for an evaluation in five years in order to see the demand of CART services in the state of Illinois. IDHHC needs to meet with the CART Task Force to review the data in order to determine the next steps in serving the hard of hearing population with CART Services.
- IDHHC oversaw the Early Intervention Task Force and Deaf Education Task Force which has been made available on IDHHC's website. This is an area in which the Commission should consider to revisit and address the recommendations and issues of these task forces.
- IDHHC has lead the Support Services Providers (SSP) Task Force to serve the deafblind community so that they can receive communication and environment information from providers. This service is similar to the Home Services Program (HSP) that provides physically disabled individuals with home needs. The HSP does not address the needs of deafblind individuals due to the difference in disabilities. The SSP Task Force recommended that legislation should be considered in order to address the needs for deafblind populations.
- The Division of Mental Health for many years has left the Statewide Deaf Services Coordinator position vacant. IDHHC realized the need for this position to be filled and so advocated for this position. This position is vital to assisting deaf and hard of hearing individuals with mental health issues. IDHHC is pleased that the position is now filled and serving the deaf and hard of hearing in the field of mental health.
- Similarly, the Department of Children and Family Services had a vacancy in the Statewide Deaf Services Coordinator position. IDHHC has worked with DCFS to ensure that the position be filled. IDHHC and DCFS are committed to provide appropriate services for deaf and hard of hearing children and parents. IDHHC was pleased to see the position filled and effectively serving the deaf and hard of hearing community.
- Beth Purvis, Secretary of Education asked IDHHC take the lead in the search for a new superintendent at the Illinois School for the Deaf (ISD). IDHHC pulled together a group of educational experts in order to ensure the selection of the best candidate for the position. IDHHC was pleased to announce that upon recommendation the Office of Governor appointed Julie Nist to become the new Superintendent for ISD.
- IDHHC has entered an inter-agency agreement with the Illinois Emergency Management Agency (IEMA) that in the event of disasters, IDHHC will assist IEMA to address the Deaf, hard of hearing, and deafblind needs assisting in distribution of information and communication so that all people can remain safe.
- IDHHC and IEMA have worked together to develop video logs in American Sign Language on emergency preparedness made available online.

- IDHHC has worked in collaboration with Mt. Sinai Hospital to develop the video logs in American Sign Language on health issues.
- IDHHC has developed a card available on our website for deaf and hard of hearing individuals to print and keep in their wallet or in their car in the event they need to communicate with law enforcement or medical personnel.
- IDHHC has been committed to reaching out and cooperating with different organizations, professionals, and sister agencies to ensure that services are available for deaf and hard of hearing citizens.
- The most recent accomplishment of IDHHC was the agreement to bring cued speech testing into the state of Illinois. This ensures that cued speech translators are skilled and qualified for cued speech users.

This list is not comprehensive and only is a beginning of all the accomplishments of IDHHC. I am proud to have been part of the team that accomplished all of this and more in just 13 years. This is even more impressive when considering budget challenges and being short staffed. IDHHC does not have a Fiscal Officer and the staff has worked hard to share the many responsibilities in order to meet the state mandates and IDHHC statute mandates. Although I am not longer a part of this special team, I will continue to provide and offer my support to IDHHC and to advocate for the deaf, hard of hearing, deafblind, and interpreters in the state of Illinois.

If there is anything that I could do to help your office to achieve your mission, please feel free to contact me. Again, it has been my pleasure to be public servant for the State of Illinois these past 13 years. I hope to continue serving the public in the state of Illinois in a different capacity. Thank you.

Sincerely,



John Miller

Cc: Dennis O'Brien, IDHHC Commission Chairperson



December 21, 2017

Governor Bruce Rauner  
Office of the Governor  
207 State House  
Springfield, IL 62706

Dear Honorable Governor Rauner,

While Senate Resolution 528 (SR528) was passed on May 31, 2017, there was no announcement from the Illinois Deaf and Hard of Hearing Commission (IDHHC) or the Governor's Office regarding the solicitation of feedback from the community until IDHHC Chairperson Dennis O'Brien's video on November 1, 2017. We, the McLakes Chapter of Illinois Association of the Deaf (IAD), were not happy with the limited timeframe provided. This further supports the claims that IDHHC demonstrates a lack of transparency with the Deaf community and is inconsistent with communicating with the community. The McLakes Chapter also expresses concerns that there is no representation of the Deaf community outside of IDHHC when analyzing the community's feedback regarding SR528. We would like to recommend additional parties, that may include but is not limited to the Chicagoland DeafBlind Alliance, Illinois Association of the Deaf, and Illinois Registry of Interpreters for the Deaf, join the IDHHC and Governor's Office when meeting to discuss SR528.

Firstmost, the McLakes Chapter would like to state that we have no confidence in the current commissioners' ability to lead IDHHC into a better future. The Senate Bill 0752 proposed a general composition of the commission, which included different representatives of the Deaf, DeafBlind and Hard of Hearing community. We support having a clear description of each representatives as presented in SB752 because we believe that IDHHC can be a successful, independent agency if overseen by knowledgeable commissioners as highlighted in the bill.

Our recommendations are as followed, based on the 5 issues identified by the Senate:

1. IDHHC budget appropriations and projections show significantly more money and resources are being allocated towards complaint investigation and the testing, evaluation and licensing of sign language interpreters for the Deaf than communication access for individuals with hearing loss. This clearly shows Deaf and Hard of Hearing people are not being served as originally intended by the law. However, we have concerns that if the interpreter licensure is moved under Illinois Department of Financial and Professional Regulation (IDFPR), the understanding of Deaf Culture and our language, American Sign Language (ASL), may get lost. We recommend promptly filling the vacant position within IDHHC to oversee interpreter licensure; this way we can ensure IDHHC's primary focus is on the Deaf, DeafBlind, and Hard of Hearing community's needs.

2. As mentioned earlier, we believe that IDHHC can be a successful, independent agency if overseen by appropriate and qualified commissioners. Moving this agency under the Department of Human Services (DHS) is highly inadvisable as we believe the commissioners have a better understanding of the culture, language, and needs of the Deaf community. DHS may not have a full appreciation of what the Deaf, DeafBlind, and Hard of Hearing community's issues and needs are.
3. We feel that the ASL community is underserved by IDHHC. The DeafBlind and Deaf individuals from diverse backgrounds are also underserved. As previously mentioned, the Senate Bill 0752 included descriptions of different representatives on the Commission which would help remedy this problem.
4. The hiring process has been impacted greatly and we believe IDHHC's focus should be on filling the Director position first. As recommended in SB752, the director should be fluent in ASL and understand the needs and culture of the Deaf, DeafBlind, and Hard of Hearing community.
5. If appropriately selected, commissioners should be able to oversee the budget and other responsibilities as stated in their job description. We also feel that IDHHC use of money has been mismanaged so adding a staff member that has experience with managing the budget would be favorable.

Those are our recommendations. Thank you in advance for reading our letter and taking our recommendations in consideration.

Sincerely,

McLakes Chapter of Illinois Association of the Deaf

CC:

Senator McCann

Senator Morrison

Senator Althoff

Illinois Association of the Deaf





*"The world has watched the deaf community come of age. Together we've*

Dr. I. King Jordan, President  
Gallaudet University

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December 26, 2017

Governor Bruce Rauner  
Office of the Governor  
207 State House  
Springfield, IL 62706

Dear Hon. Governor Rauner:

During our correspondences with members of the General Assembly, we learned it is your desire, and possibly your intention, to move the Illinois Deaf and Hard of Hearing Commission (IDHHC) under the purview of Department of Human Services (DHS) and the management of Interpreter Licensure to the Illinois Department of Financial and Professional Regulation (DFPR). We understand and appreciate there are perceived operational and financial efficiencies to be realized by such moves, but have a number of concerns and recommendations for your consideration.

As our association has shared with your office, the concerns raised pertaining the IDHHC is not of a recent phenomenon, but a long-term, sustained problem existing before the staff's vacancies and current state budget crisis. Furthermore, the original statute creating the IDHHC is outdated and contributes to IDHHC's ineffective management and inadequate delivery of services to Deaf, DeafBlind and Hard of Hearing Illinoisans. There is need for agency reform, and this is why members of the deaf community worked with legislators to introduce Senate Bill 752 (SB752) earlier this year.

Sweeping reform where the needs of the very community the IDHHC is supposed to serve gets lost in an agency the size of DHS is not ideal. The IDHHC was established as an executive agency of the Governor's Office to ensure the collective interests of Deaf, DeafBlind and Hard of Hearing Illinoisans regarding communication access, education, employment, healthcare and technology are represented among Illinois' policy makers, including state legislators and executive agencies of the Governor's Office. It is our intention to restore the integrity and purpose of the agency's formation and existence.

Decisions made by DHS for IDHHC would be far less efficient and effective than decisions made by competent and qualified commissioners; DHS leadership does not have the necessary cultural competence and linguistic knowledge to appropriately and effectively lead, advise and supervise the IDHHC. The unnecessary red tape bureaucracy at DHS also could negate efficiency realized by moving IDHHC under DHS' control. Any decision the IDHHC Director intends to make, including hiring, purchasing, submitting budget requests, developing/approving policies, and so forth must be vetted and approved by DHS. Collectively, a move under DHS would potentially mean the collective interests of this already marginalized community would get lost in the shuffle, much like the Illinois School for the Deaf (ISD) has under DHS' control.

We are in the position we are in today largely because of commissioners' dereliction of their

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fiduciary responsibilities of supervising and evaluating the IDHHC and ensuring the agency satisfies the mandates established and outlined in 20 ILCS 3932. We recommend filling vacant commissioner positions and replacing all the commissioners who are now serving expired terms with qualified and competent individuals who have diverse professional and educational backgrounds that will best enable them to represent concerns, needs and recommendations of the population the commissioners are supposed to represent. The current make-up of the commission is not reflective of the Deaf, DeafBlind and Hard of Hearing community or the professionals that serve the community in question, and that's one of the reasons we proposed language to reform the make-up of the commission in SB752.

A fully represented commission, one with qualified and competent individuals, would then be able to reevaluate priorities, revisit IDHHC's currently inadequate strategic plan and hire a director with the appropriate skillset to accomplish the objectives set forth in the strategic plan. However, there are two position vacancies, separate from the Director position that has yet to be posted, in which the IDHHC staff members are looking to fill. This is counterintuitive and ineffective as a permanent director should be the one making the hires, not the interim director.

Last, but not least, prior to the IDHHC assuming responsibilities of managing interpreter licensure in accordance to the Interpreter for the Deaf Licensure Act of 2007, the IDHHC satisfied the mandates established in law. Upon the implementation date of January 1, 2009, the IDHHC ceased to satisfy the mandates and claimed budget cuts as a reason for not providing services and activities. However, per the Office of Management and Budget, the enacted appropriation to the IDHHC remained steady or increased since FY 2010 (excluding the period of where no budget was in place).

The IDHHC, with appropriate leadership and management, should in theory be able to appropriately and effectively manage Interpreter Licensure. As members of a linguistic and cultural minority, our utmost concern is communication access standards are not compromised. This requires necessary cultural competence to mediate the issues impacting the deaf and interpreting communities. To this end, we are not in favor of a move of interpreter licensure to DFPR. If a move is necessitated, we posit the integrity of the Interpreter Licensure Board and current licensure standards are maintained or strengthened. We also recommend representatives from the Illinois Registry of Interpreters for the Deaf and Illinois Association of the Deaf be a part of the dialogue regarding any proposed changes to interpreter licensure, especially as these changes could impact members of our respective communities.

With our proposed recommendations taking effect, we foresee the IDHHC becoming a well-run agency that effectively collaborates with other state agencies to affect positive changes in Illinois and decreasing the burden of our community on the state.

Thank you considering our recommendations.

Sincerely,

Illinois Association of the Deaf Board of Directors

*Corey Axelrod*

Corey Axelrod  
President

*Kevin Ryan*

Kevin Ryan  
Vice President

*Leon Devriendt*

Leon Devriendt  
Secretary

*Elke Weinbrenner*

Elke Weinbrenner  
Membership Secretary

*Edison Lopez, Jr.*

Edison Lopez, Jr.  
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*Earl Weston*

Earl Weston  
Chicago Chapter Representative

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Cc:

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Representative C.D. Davidsmeyer (via email)

Senator Sam McCann (via email)

Representative Michelle Mussman (via email)

Mr. Andrew Perkins, Chief Senate Liaison (via email)

Mr. Chris Kantas, Policy Advisor (via email)

Mr. Andrés J. Gallegos, Esq., Robbins, Salomon & Patt, Ltd.  
(via email)

Commissioners at the Illinois Deaf and Hard of Hearing  
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Adults (ALDA) Chicago (via email)

Mr. Bryen Yunashko, President, Chicagoland DeafBlind  
Alliance (via email)

Ms. Deirdre Keane, President, Hearing Loss Association of  
America, Chicago Lincoln Park Chapter (via email)

Ms. Teri Hedding, President, Illinois Registry of Interpreters  
for the Deaf (via email)

Ms. Janet Tusk, President, Hearing Loss Association of  
America, Illinois Cochlear Implant Chapter (via email)

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